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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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JEROLD L. JACOBS

September 16, 1993

William F. Caton, Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20554

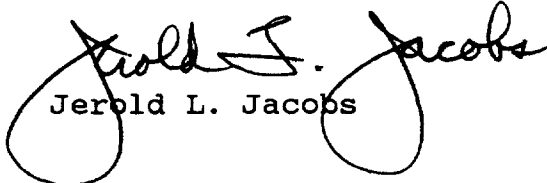
Re: MM Docket No. 93-91  
FM Table of Allotments

Dear Mr. Caton:

Enclosed herewith, on behalf of Kingsley H. Murphy, Jr., licensee of Station WISS-FM, Berlin, Wisconsin, are an original and four (4) copies of his "MOTION TO STRIKE PORTIONS OF REPLY COMMENTS OF MARKESAN BROADCASTING COMPANY BECAUSE OF GROSS ERRORS AND ABUSE OF PROCESS and MOTION FOR LEAVE TO FILE" in the above-referenced proceeding.

Please direct all inquiries and communications concerning this matter to the undersigned.

Very truly yours,

  
Jerold L. Jacobs

Enc.

cc: As on Certificate of Service (all w/enc.)

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SEP 16 1993

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

In the Matter of )

Amendment of Section 73.202(b),  
 Table of Allotments,  
 FM Broadcast Stations  
 (Berlin, DeForest, Wautoma, and  
 Markesan, Wisconsin)

) MM Docket No. 93-91  
 )  
 ) RM-8197  
 ) RM-8279  
 )

To: Chief, Allocations Branch  
 Policy and Rules Division  
 Mass Media Bureau

**MOTION TO STRIKE PORTIONS OF REPLY COMMENTS  
 OF MARKESAN BROADCASTING COMPANY  
 BECAUSE OF GROSS ERRORS AND ABUSE OF PROCESS**

and

**MOTION FOR LEAVE TO FILE**

**KINGSLEY H. MURPHY, JR.** ("Murphy"), licensee of Station WISS-FM, Berlin, Wisconsin and an active party to this proceeding, by his attorneys, hereby moves the Commission to:

(1) grant him leave to file this extraordinary pleading for good cause shown; and (2) strike portions of the July 15, 1993 Reply Comments of Mark J. Kastein d/b/a Markesan Broadcasting Company ("Markesan") (RM-8279) because of gross errors and abuse of process reflected therein. In support whereof, Murphy shows the following:

1. In his previous Reply Comments and Counterproposal Reply Comments, Murphy has already demonstrated that the Markesan counterproposal is so flawed legally that it should be dismissed summarily. However, Markesan's July 15, 1993 counterproposal reply comments ("Reply Comments") contain new

legal and technical engineering defects, and Murphy respectfully submits that the public interest in having a fair and accurate record for decision in this proceeding provides ample good cause for the Commission to grant leave for Murphy to convey the correct technical information to the Commission and to respond to the belated and erroneous arguments contained in Markesan's pleading. In this connection, Murphy notes that DeForest Broadcasting Company also filed a motion to strike the Reply Comments (and Markesan opposed this motion on August 30, 1993). As he will now demonstrate, Murphy has noted additional errors in Markesan's pleading and believes there are additional justifications for the Commission to entertain these extraordinary pleadings to correct the record and thwart Markesan's attempted abuse of the Commission's processes.

2. Markesan's Reply Comments contain two egregious errors. First, Markesan erroneously maintains (at 2-3 and App. 1, p. 6) that its proposed allotment of Channel 284A at Markesan, Wisconsin will provide a first and second aural reception service in the Markesan area. These contentions are fully rebutted by the attached Engineering Statement by Clarence M. Beverage of Communications Technologies, Inc., who concludes (at 5) that the engineering statement upon which Markesan relies is seriously flawed technically and that, in reality "the entire area is well served -- more than five daytime aural services and more than two nighttime aural services" (emphasis added).

3. Second, Markesan contends (at 3-5) that "Markesan is to be preferred to DeForest under an analysis of the communities' Section 307(b) attributes". Murphy urges that the submission of this information for the first time in Markesan's Reply Comments is legal error, because that information should have been included in Markesan's original counterproposal; hence, the counterproposal was not "substantially complete when filed". See FM Table of Allotments (Provincetown MA et al.), 8 FCC Rcd 19, 20 ¶10 (MM Bur. 1992) ("Counterproposals must be technically correct and substantially complete when filed"). Put differently, Murphy previously pointed out in his June 28, 1993 Reply Comments (at ¶10) that "Markesan has provided no socio-economic information to rebut the presumption in favor of DeForest," and Markesan's attempt to cure this fatal gap in its Reply Comments is too late, because it is post-filing. See Colorado Radio Corp. v. FCC, 118 F.2d 24, 26 (D.C. Cir. 1941) (Commission may properly reject late proffers of more evidence). In sum, Markesan's "service" arguments should be struck as erroneous and its "socio-economic" arguments should be struck as untimely.

4. Finally, Murphy notes a very significant omission from Markesan's Reply Comments. In Murphy's Reply Comments (at ¶¶6-7), Murphy observed that the same consulting engineer (Lyle Robert Evans) filed the Markesan and Wautoma mutually exclusive counterproposals, and Murphy urged that the Markesan counterproposal should be dismissed as an abuse of the

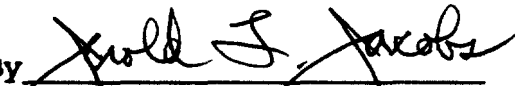
Commission's processes. Murphy reasoned that a presumption is created that either Mr. Evans is an undisclosed real party in interest in one or both of the counterproposals or that the stated intentions of one or both of the petitioners to construct their proposed facilities is not bona fide. Murphy maintained that the only plausible explanation for the conflicting Markesan/Wautoma filings here is an attempt by the proponents or their agent (Mr. Evans) to illegally "stack the deck" in this proceeding against DeForest and Murphy for illicit purposes, which is a blatant abuse of the Commission's FM channel rulemaking process. Despite these very serious allegations by Murphy, Markesan's Reply Comments do not address this matter at all. Under established evidentiary presumptions, Markesan's silence on this important abuse of process issue should be read adversely to Markesan.

5. In sum, given the errors of commission and omission in Markesan's Reply Comments, Murphy submits that the appropriate solution is to strike all erroneous and belated matter and to dismiss Markesan's counterproposal as fatally defective ab initio and abusive of the Commission's processes. See FM Table of Allotments (Monterey TN et al.), 7 FCC Rcd 1606, 1607 ¶6 (1992) (issues concerning misconduct occurring inside an allotment proceeding are relevant to the determination concerning the action to be taken in that proceeding); FM Table of Allotments (Atlantic IA et al.), 7 FCC Rcd 1370, 1371 n.5 (MM Bur. 1992) (Commission will not allot a channel

where there is no assurance that a party will file an application for the allotment); FM Table of Allotments (Provincetown MA et al.), supra.

Respectfully submitted,

KINGSLEY H. MURPHY, JR.

By   
Howard J. Braun  
Jerold L. Jacobs

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(202) 463-7177

His Attorneys

Dated: September 16, 1993

**OTHER SERVICES STUDY**

**MM DOCKET NO. 93-92, RM 8197, 9279**

**BERLIN, DE FOREST, WAUTOMA AND MARKESAN, WISCONSIN**

**PREPARED ON BEHALF OF**

**KINGSLEY H. MURPHY, JR.**

**WISS-FM BERLIN, WISCONSIN**

**SEPTEMBER, 1993**

**OTHER SERVICES STUDY  
MM DOCKET NO. 93-92, RM 8197, 9279  
BERLIN, DE FOREST, WAUTOMA AND MARKESAN, WISCONSIN  
PREPARED ON BEHALF OF  
KINGSLEY H. MURPHY, JR.  
WISS-FM BERLIN, WISCONSIN**

**SEPTEMBER, 1993**

**SUMMARY**

The following statement has been prepared on behalf of **Kingsley H. Murphy, Jr. ("Murphy")**, licensee of FM broadcast station WISS, Channel 272A, Berlin, Wisconsin. **Murphy** is a party to this proceeding in that the proposed Rule Making suggests deletion of WISS's current frequency of operation, Channel 272A at Berlin, Wisconsin and the substitution of Channel 284A at Berlin, Wisconsin. A showing concerning other services has been submitted by Markesan Broadcasting Company in its Counterproposal Reply Comments. The Markesan study arrives at incorrect conclusions as described below. **Murphy** believes that the instant Other Services Study is appropriate given the incorrect assumptions and conclusions placed in the record by the Markesan filing and subsequent filings by De Forest Broadcasting Company and by Markesan.

**SUMMARY OF PROPOSED MODIFICATIONS TO THE TABLE OF ALLOTMENTS**

The following table lists the changes to the Table of Allotments currently before the Commission at this time in MM Docket No. 93-91.

<u>PRM</u> <u>Community</u>	Channel No.	
	<u>Present</u>	<u>Proposed</u>
Berlin, WI	272A	284A
De Forest, WI	--	226A
Wautoma, WI	226A	272A



MARKESAN COUNTERPROPOSAL

<u>Community</u>	Channel No.	
	<u>Present</u>	<u>Proposed</u>
Berlin, WI	272A	272A
De Forest, WI	--	--
Wautoma, WI	226A	226A
Markesan, WI	--	284A

WAUTOMA RADIO COMPANY COUNTERPROPOSAL

<u>Community</u>	Channel No.	
	<u>Present</u>	<u>Proposed</u>
Berlin, WI	272A	272A
De Forest, WI	--	--
Wautoma, WI	226A	226C3

This Other Services Study does not take into account the Wautoma Channel 226C3 proposal since that proposal cannot be implemented in accordance with *Section 73.207* of the Commission's Rules and Regulations and it has not been placed on Public Notice.

The coordinates which apply to the allocations to be included in this Other Services Study are:

Berlin, WI	CH 284A	N.L. 43-56-55 W.L. 88-59-09
De Forest, WI	CH 226A	N.L. 43-12-21 W.L. 89-16-45
Wautoma, WI	CH 226A	N.L. 44-04-18 W.L. 89-17-30
	CH 272A	N.L. 44-08-18 W.L. 89-17-30
Markesan, WI	CH 284A	N.L. 43-43-53 W.L. 89-01-24

A review of the tabulation above shows that there is one set of coordinates per community with the exception of Wautoma, Wisconsin. A set of reference coordinates placed at the approximate center of the five coordinate pairs has been used to select stations considered in the Other Services Study. The study center point is:

N.L. 43° 44' 42"

W.L. 89° 08' 42"

All AM stations within 125 km of these coordinates were considered and all FM stations within 80 km were considered. In addition, selected stations at greater distances were included if they would duplicate a portion of the service area.

#### **CONTOUR LOCATIONS AND METHODOLOGY**

The technical facilities for all FM stations and vacant allocations were taken from the FCC's computer database as provided by NTIS. The radiation center AMSL, ERP and transmitter site coordinates were calculated with terrain data at 10 degree intervals, 36 evenly spaced radials, from the NGDC 30 second terrain database to determine contour locations. Each 60 dBu contour location was determined by use of computer program of known accuracy and repeatability using FCC *Section 73.333, Figure 1*.

The technical facilities for all AM stations were taken from the FCC computer database as provided by NTIS. The technical facilities for each station were used to determine inverse field at one kilometer. The notified radiation efficiency was used for non-directional stations. Radiation was computed in accordance with *Section 73.150* and *73.152* of the Rules for directional antennas. Distance to the 0.5 mV/m contour was determined in accordance with the methodology described in *Section 73.183* of the Rules. Figure M3 soil conductivity data was used for all computations with radials evenly spaced at 10 degree intervals.

## **MAP FIGURES**

Figure 1 shows the 60 dBu contour locations for the five subject allocations (see page 2) and for the 60 dBu contours of all other stations and allocations studied. Only licensed Construction Permit and vacant allocation facilities were considered. If a station had both a licensed and Construction Permit facility, the Construction Permit facility was shown. The five subject allocations' 60 dBu contours are plotted in dashed lines on this map figure for ease of identification.

Figure 1, Page 2 is a tabulation of all FM stations whose 60 dBu contours duplicate a portion of the five proposed 60 dBu allocation coordinates.

Figure 2 shows the 60 dBu contours for the five allocations and the 0.5 mV/m contours for all other daytime AM facilities whose 0.5 mV/m contours overlap the allocation 60 dBu contours.

Figure 2, Pages 2-6 is a tabulation of all AM stations studied. The five allocations' 60 dBu contours are plotted with dashed lines.

Figure 3 shows the 60 dBu contours for the five allocations and the nighttime interference free contours of AM stations shown on Figure 3, page 2.

## **MAP FIGURE ANALYSIS**

A review of Figures 1, 2 and 3 shows that twenty-nine FM stations and forty-six AM stations serve all, or portions of, the areas served by the five Class A allocations studied herein. The following conclusions may be drawn from the map figures.

1. During daytime hours, the area within the 60 dBu contours for each of the five subject allocations receives five or more aural services.
2. During nighttime hours, the 60 dBu contours of all five proposed allocations are duplicated by at least two other aural services.

### **CONFLICTS**

The analysis above is in conflict with Markesan Broadcasting Company's statement that the proposed Channel 284A allocation at Markesan would provide a new first and second aural service. This statement is incorrect because it appears that signal levels of 70 dBu, or greater, were counted by Markesan rather than signal levels of 60 dBu, or greater. Further, services within the 60 dBu contour do not appear to have been considered, only services to the community of Markesan, itself.

The Markesan engineering analysis, from which the number of aural services must be drawn, is unclear and incomplete. There is no tabulation of stations studied or contour (spaghetti) maps required to make, or confirm, a statement concerning the number of services.

De Forest Broadcasting filed an opposition to the Markesan filing. De Forest states that Markesan's other services showing is incorrect because Markesan used the 70 dBu instead of 60 dBu signal levels. De Forest goes on to state that the Markesan proposal does not provide first or second service to any service area and that there are five aural services to the community of Markesan. **Murphy** does not disagree with De Forest's conclusion but would point out that AM stations were calculated on the 5 mV/m contour where the protected, primary, service contour is the 0.5 mV/m contour. Further, **Murphy** wishes to clarify the record concerning other services pertaining to all five subject allocations with the full documentation which should accompany a full Other Services showing.

### **CONCLUSION**

**Murphy** has conducted a full, formal Other Services Study to determine the number of aural services which duplicate the 60 dBu service contours of all five subject allocations. These studies show that the entire area is well served -- more than five daytime aural services and more than two nighttime aural services. Therefore, under these circumstances, the Commission's Allotment Priorities should focus on first local service to the largest community -- here, De Forest, Wisconsin.

The foregoing was prepared on behalf of **Kingsley H. Murphy, Jr.** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By  \_\_\_\_\_  
**Clarence M. Beverage**  
for Communications Technologies, Inc.  
Marlton, New Jersey

**SUBSCRIBED AND SWORN TO** before me

this 15<sup>th</sup> day of September, 1993,

Esther G. Sperbeck, NOTARY PUBLIC

**ESTHER G. SPERBECK**  
**NOTARY PUBLIC OF NEW JERSEY**  
**MY COMMISSION EXPIRES OCT 15, 1997**

# ALLOCATION PROPOSALS

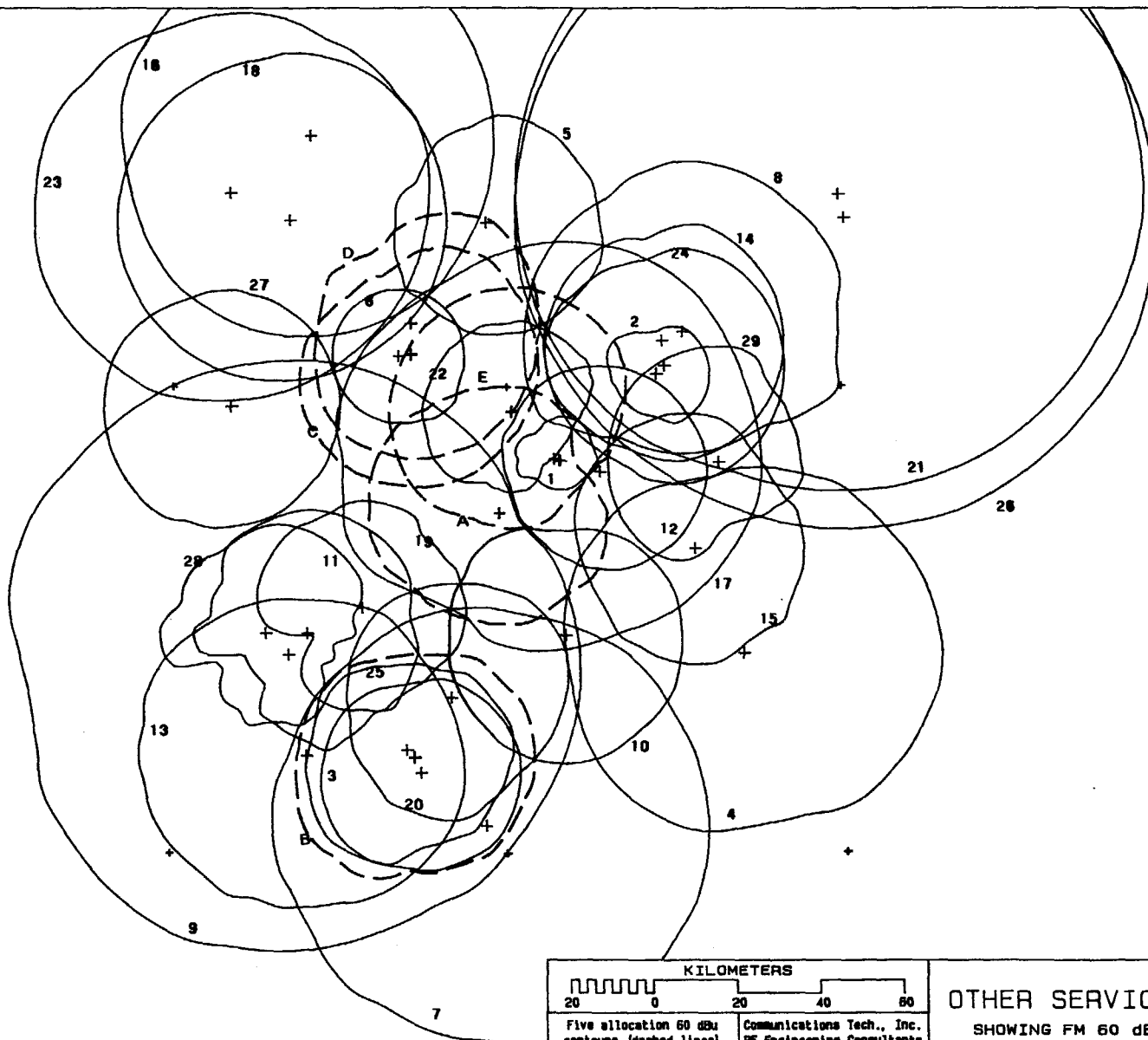
CODE	COMMUNITY	CH
A	BERLIN, WI	284A
B	DE FOREST, WI	226A
C	WAUTOMA, WI	226A
D	WAUTOMA, WI	272A
E	MARKESAN, WI	284A

N 44 0 0  
W 91 0 0

N 44 0 0  
W 87 0 0

N 43 0 0  
W 91 0 0

N 43 0 0  
W 87 0 0



Transverse Mercator

KILOMETERS

20 0 20 40 60

Five allocation 60 dBu contours (dashed lines)  
other stations solid line

Communications Tech., Inc.  
RF Engineering Consultants  
Marlton, New Jersey 08053

## OTHER SERVICES STUDY

SHOWING FM 60 dBu CONTOURS

SEPTEMBER 1993

FIGURE 1

FIGURE 1  
(PAGE 2)

TABULATION OF FM STATIONS PROVIDING 60 dBu SERVICE

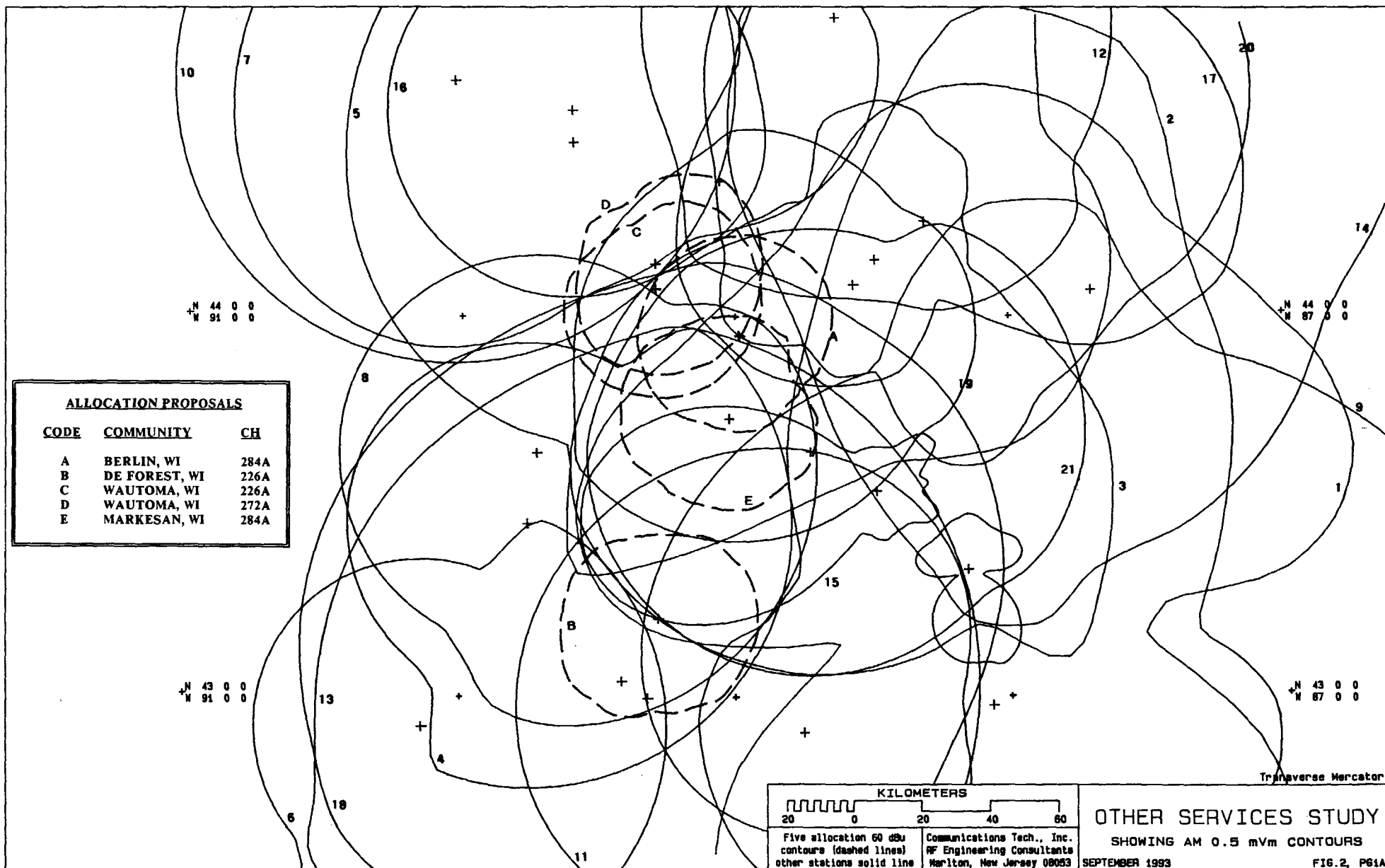
TO THE BERLIN, DeFOREST, WAUTOMA AND MARKESON  
PROPOSED 60 dBu CONTOURS

SEPTEMBER 1993

Search of channels 200 to 300, at N. 43 44 42, W. 89 8 42:

CONTOUR NUMBER	CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG
1	WRPNFM	Ripon	WI	211	A	L	26.7	0.0	65.8°
2	WRSTFM	Oshkosh	WI	212	A	L	57.1	0.0	56.5°
3	WMADFM	Sun Prairie	WI	221	A	L	64.1	0.0	188.1°
4	WBWIFM	West Bend	WI	223	B	L	76.9	0.0	117.2°
5	WDUXFM	Waupaca	WI	224	A	L	68.0	0.0	5.6°
6	WAEIFM	Wautoma	WI	226	A	C	38.8	0.0	337.8°
7	WJJO	Watertown	WI	231	B	L	76.5	0.0	174.9°
8	WROE	Neenah-Menasha	WI	232	C3	C	68.1	0.0	52.4°
9	WOLXFM	Baraboo	WI	235	B	L	54.1	0.0	229.4°
10	WXRO	Beaver Dam	WI	237	A	L	40.0	0.0	139.9°
11	WZST	Portage	WI	240	A	C	38.3	0.0	252.3°
12	WYURFM	Ripon	WI	241	A	L	35.0	0.0	76.3°
13	WMLI	Sauk City	WI	242	B1	L	69.8	0.0	211.7°
14	WUSW	Oshkosh	WI	245	A	L	63.0	0.0	51.2°
15	WFDL	Lomira	WI	249	A	C	57.7	0.0	100.1°
16	WSPT	Stevens Point	WI	250	C1	L	95.2	0.0	338.0°
17	WPKR	Waupun	WI	258	C2	L	25.7	0.0	63.7°
18	WIZDFM	Rudolph	WI	260	C3	V	79.5	0.0	329.0°
19	WDDC	Portage	WI	261	A	C	33.5	0.0	224.1°
20	WYKY	Columbus	WI	263	A	C	45.6	0.0	182.1°
21	WIXX	Green Bay	WI	266	L	C	117.7	0.0	60.6°
22	WISSFM	Berlin	WI	272	A	L	26.0	0.0	29.5°
23	WWRW	Wisconsin Rapids	WI	277	C1	L	92.8	0.0	323.8°
24	WMGV	Oshkosh	WI	280	A	L	59.8	0.0	55.9°
25	WYZM	Waunakee	WI	286	A	C	59.4	0.0	192.2°
26	WAPL	Appleton	WI	289	L	C	115.3	0.0	53.3°
27	WDKM	Adams	WI	291	A	C	59.8	0.0	293.3°
28	WNNOFM	Wisconsin Dells	WI	295	A	L	47.8	0.0	255.9°
29	WFON	Fond Du Lac	WI	296	A	L	63.4	0.0	80.5°

NOTE: Distance and bearing are from study point to station.





# ALLOCATION PROPOSALS

CODE	COMMUNITY	CH
A	BERLIN, WI	284A
B	DE FOREST, WI	226A
C	WAUTOMA, WI	226A
D	WAUTOMA, WI	272A
E	MARKESAN, WI	284A

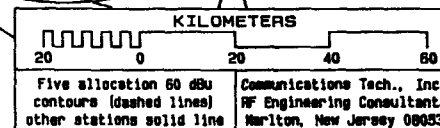
N 44 0 0  
W 91 0 0

N 43 0 0  
W 91 0 0

N 44 0 0  
W 87 0 0

N 43 0 0  
W 87 0 0

Transverse Mercator



## OTHER SERVICES STUDY

SHOWING AM 0.5 mV/m CONTOURS

SEPTEMBER 1993

FIG 2, P61B

FIGURE 2  
(Page 2)

AM STATIONS WHO PLACE A DAYTIME 0.5 mV/M CONTOUR OVER A PORTION  
OF THE BERLIN, DeFOREST, WAUTOMA AND MARKESON 60 dBU CONTOURS  
SEPTEMBER 1993

CONTOUR  
NUMBER

1	540, 'US', 'WI', 'JACKSON	'WYLO	'B', 'D', 'U', 'L', 900927
	43, 20, 0, 88, 9, 10, 1, 92.1, 119.4		
	3, .400, 197.00, 10.00, 1.00, 0, 0		
	1, .942, -179.2, .0, .0, 0, 1, .0, 63.8, 10.2, .0, .0		
	2, 1.000, .0, 88.9, 354.0, 0, 1, .0, 63.8, 10.2, .0, .0		
	3, .628, 137.7, 177.8, 354.0, 0, 1, .0, 63.8, 10.2, .0, .0		
2	620, 'US', 'WI', 'MILWAUKEE	'WTMJ	'B', 'D', 'U', 'L', 810112
	43, 1, 56, 88, 7, 54, 1, 113.9, 133.7		
	1, 5.000, 852.86, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 2, .0, 90.8, 14.5, 153.9, .0		
3	690, 'US', 'WI', 'OSHKOSH	'WXOL	'B', 'D', 'U', 'L', 920312
	44, 4, 51, 88, 33, 53, 1, 59.6, 51.0		
	3, .250, 152.08, -1.00, 1.00, 11, 0		
	1, 1.000, 3.1, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, .525, 148.5, 70.0, 15.0, 0, 0, 90.0, .0, .0, .0, .0		
	3, .475, -148.5, 70.0, 195.0, 0, 0, 90.0, .0, .0, .0, .0		
4	740, 'US', 'WI', 'BARABOO	'WRPQ	'B', 'D', 'U', 'L', 870122
	43, 27, 19, 89, 45, 13, 1, 58.6, 236.9		
	1, .250, 147.26, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 70.4, .0, .0, .0, .0		
5	800, 'US', 'WI', 'WAUPACA	'WDUX	'B', 'D', 'U', 'L', 870202
	44, 21, 15, 89, 3, 29, 1, 68.0, 5.8		
	2, 5.000, 650.17, -1.00, 1.00, 5, 0		
	1, 1.000, .0, .0, .0, 0, 0, 76.0, .0, .0, .0, .0		
	2, .650, -130.0, 60.0, 300.0, 0, 0, 76.0, .0, .0, .0, .0		
6	810, 'US', 'WI', 'DODGEVILLE	'WDMP	'B', 'D', 'D', 'L', 0
	42, 55, 10, 90, 8, 6, 1, 121.7, 221.4		
	1, .250, 146.45, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 88.9, .0, .0, .0, .0		
7	840, 'US', 'WI', 'VILLAGE OF PLOVER	'WTLI	'B', 'D', 'D', 'C', 860423
	44, 27, 20, 89, 35, 40, 1, 86.7, 335.7		
	2, 5.000, 682.68, 22.36, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 81.4, .0, .0, .0, .0		
	2, .782, 90.0, 90.0, 151.5, 0, 0, 81.4, .0, .0, .0, .0		

FIGURE 2  
(Page 3)

8	900, 'US', 'WI', 'WISCONSIN DELLS	'WNNO	'B', 'D', 'U', 'L', 870202
	43, 38, 23, 89, 43, 14, 1,	47.7,	256.0
	1, 1.000, 296.12, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0,	84.3,	.0, .0, .0, .0
9	920, 'US', 'WI', 'MILWAUKEE	'WOKY	'B', 'D', 'U', 'L', 811028
	42, 58, 32, 88, 3, 56, 1,	122.1,	134.1
	4, 5.000, 630.86, -1.00, 1.00, 7, 0		
	1, 1.000, .0, .0, .0, 0, 0,	80.8,	.0, .0, .0, .0
	2, .419, -176.3, 200.0, 23.0, 0, 0,	80.8,	.0, .0, .0, .0
	3, .890, -38.4, 158.3, 8.5, 0, 0,	80.8,	.0, .0, .0, .0
	4, .470, -138.0, 61.3, 63.3, 0, 0,	80.8,	.0, .0, .0, .0
10	930, 'US', 'WI', 'AUBURNDALE	'WLBL	'B', 'D', 'D', 'L', 0
	44, 36, 52, 90, 2, 8, 1,	119.8,	324.0
	1, 5.000, 784.50, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0,	153.2,	.0, .0, .0, .0
11	940, 'US', 'WI', 'FORT ATKINSON	'WFAW	'B', 'D', 'U', 'L', 890309
	42, 54, 24, 88, 45, 6, 1,	98.4,	161.0
	2, .500, 223.02, 10.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0,	90.0,	.0, .0, .0, .0
	2, .620, 240.0, 85.0, 310.0, 0, 0,	90.0,	.0, .0, .0, .0
12	960, 'US', 'WI', 'SHAWANO	'WTCH	'B', 'D', 'U', 'L', 740925
	44, 46, 47, 88, 37, 53, 1,	122.0,	19.4
	1, 1.000, 302.56, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0,	84.8,	.0, .0, .0, .0
13	970, 'US', 'WI', 'MADISON	'WHA	'B', 'D', 'U', 'L', 880602
	43, 2, 30, 89, 24, 31, 1,	81.0,	195.3
	1, 5.000, 683.74, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0,	90.5,	.0, .0, .0, .0
14	980, 'US', 'WI', 'TWO RIVERS	'WCUB	'B', 'D', 'U', 'L', 860122
	44, 3, 50, 87, 41, 49, 1,	121.2,	72.5
	4, 5.000, 709.80, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0,	70.5,	.0, .0, .0, .0
	2, 1.057, 224.9, 90.0, .0, 0, 0,	70.5,	.0, .0, .0, .0
	3, .477, 93.5, 180.0, .0, 0, 0,	70.5,	.0, .0, .0, .0
	4, .074, -32.6, 270.0, .0, 0, 0,	70.5,	.0, .0, .0, .0

FIGURE 2  
(Page 4)

15	990,'US','WI','MAYVILLE	'WWSR	'B','D','D','C',851030
	43, 32, 20, 88, 28, 35, 1, 58.4, 112.8		
	6, .250, 142.25, 10.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, 1.988, -6.0, 192.0, 350.0, 0, 0, 90.0, .0, .0, .0, .0		
	3, 1.000, -12.0, 384.0, 350.0, 0, 0, 90.0, .0, .0, .0, .0		
	4, 1.000, 80.0, 394.4, 3.2, 0, 0, 90.0, .0, .0, .0, .0		
	5, 1.988, 86.0, 212.1, 15.1, 0, 0, 90.0, .0, .0, .0, .0		
	6, 1.000, 92.0, 90.0, 80.0, 0, 0, 90.0, .0, .0, .0, .0		
16	1010,'US','WI','STEVENS POINT	'WSPO	'B','D','U','L',881207
	44, 32, 17, 89, 35, 43, 1, 95.1, 338.0		
	1, 1.000, 346.01, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 146.4, .0, .0, .0, .0		
17	1050,'US','WI','KAUKAUNA	'WQWM	'B','D','U','L',870202
	44, 14, 51, 88, 18, 0, 1, 87.6, 50.1		
	3, 1.000, 297.73, -1.00, 1.00, 18, 0		
	1, .500, 99.0, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, 1.000, 58.9, 143.3, 359.1, 0, 0, 90.0, .0, .0, .0, .0		
	3, .500, -99.0, 180.0, 13.0, 0, 0, 90.0, .0, .0, .0, .0		
18	1070,'US','WI','MADISON	'WTSO	'B','D','U','L',850307
	42, 59, 45, 89, 18, 50, 1, 84.3, 189.4		
	2, 10.000, 941.47, -1.00, 1.00, 5, 0		
	1, .500, 122.0, .0, .0, 0, 0, 98.7, .0, .0, .0, .0		
	2, 1.000, .0, 90.0, 345.0, 0, 0, 98.7, .0, .0, .0, .0		
19	1090,'US','WI','BERLIN	'WISS	'B','D','D','L',810507
	43, 56, 55, 88, 59, 9, 1, 26.0, 29.4		
	1, .500, 209.39, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 75.8, .0, .0, .0, .0		
20	1150,'US','WI','KIMBERLY	'WHBY	'B','D','U','L',920221
	44, 8, 48, 88, 28, 54, 1, 69.3, 49.7		
	4, 5.000, 688.80, -1.00, 1.00, 0, 0		
	1, .380, 32.0, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, 1.176, -117.0, 100.0, 20.0, 0, 0, 90.0, .0, .0, .0, .0		
	3, 1.539, 102.3, 100.0, 20.0, 1, 0, 90.0, .0, .0, .0, .0		
	4, 1.000, -32.0, 100.0, 20.0, 1, 0, 90.0, .0, .0, .0, .0		
21	1170,'US','WI','WAUPUN	'WMRH	'B','D','D','L',900723
	43, 38, 30, 88, 43, 22, 1, 35.8, 108.6		
	1, 1.000, 302.56, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 85.7, .0, .0, .0, .0		

FIGURE 2  
(Page 5)

22	1190,'US','WI','SUN PRAIRIE	'WMAD	'B','D','D','L',850307
	43, 9, 36, 89, 12, 41, 1, 65.2, 184.7		
	3, 1.000, 305.78, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, 1.976, -72.9, 120.0, 315.0, 0, 0, 90.0, .0, .0, .0, .0		
	3, 1.000, -145.7, 240.0, 315.0, 0, 0, 90.0, .0, .0, .0, .0		
23	1230,'US','WI','JANESVILLE	'WCLO	'C','U','U','L',921103
	42, 39, 35, 89, 2, 32, 1, 120.9, 176.0		
	1, 1.000, 315.43, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 115.2, .0, .0, .0, .0		
24	1240,'US','WI','POYNETTE	'WIBU	'C','U','U','L',860327
	43, 21, 38, 89, 24, 8, 1, 47.5, 206.0		
	1, 1.000, 383.02, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 181.5, .0, .0, .0, .0		
25	1250,'US','WI','MILWAUKEE	'WEMP	'B','D','U','L',830804
	42, 56, 44, 88, 3, 39, 1, 124.7, 135.0		
	2, 5.000, 865.83, -1.00, 1.00, 6, 0		
	1, .800, 57.0, .0, .0, 0, 0, 210.0, .0, .0, .0, .0		
	2, 1.000, .0, 145.0, 26.0, 0, 0, 183.0, .0, .0, .0, .0		
26	1270,'US','WI','MAUSTON	'WRJC	'B','D','U','L',880616
	43, 49, 52, 90, 4, 51, 1, 75.7, 277.6		
	1, .500, 208.25, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 69.7, .0, .0, .0, .0		
27	1280,'US','WI','NEENAH-MENASHA	'WNAM	'B','D','U','C',910301
	44, 6, 1, 88, 32, 2, 1, 62.8, 50.9		
	4, 5.000, 665.88, 22.36, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, .550, 22.2, 161.3, 134.2, 0, 0, 152.0, .0, .0, .0, .0		
	3, .350, 112.2, 176.6, 164.7, 0, 0, 90.0, .0, .0, .0, .0		
	4, .630, 90.0, 90.0, 230.0, 0, 0, 90.0, .0, .0, .0, .0		
28	1310,'US','WI','MADISON	'WIBA	'B','D','U','L',900919
	42, 59, 58, 89, 25, 47, 1, 86.0, 195.6		
	1, 5.000, 926.65, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 201.2, .0, .0, .0, .0		
29	1320,'US','WI','WISCONSIN RAPIDS	'WFHR	'B','D','U','L',660126
	44, 24, 56, 89, 50, 7, 1, 92.7, 323.8		
	1, 5.000, 906.84, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 199.0, .0, .0, .0, .0		

FIGURE 2  
(Page 6)

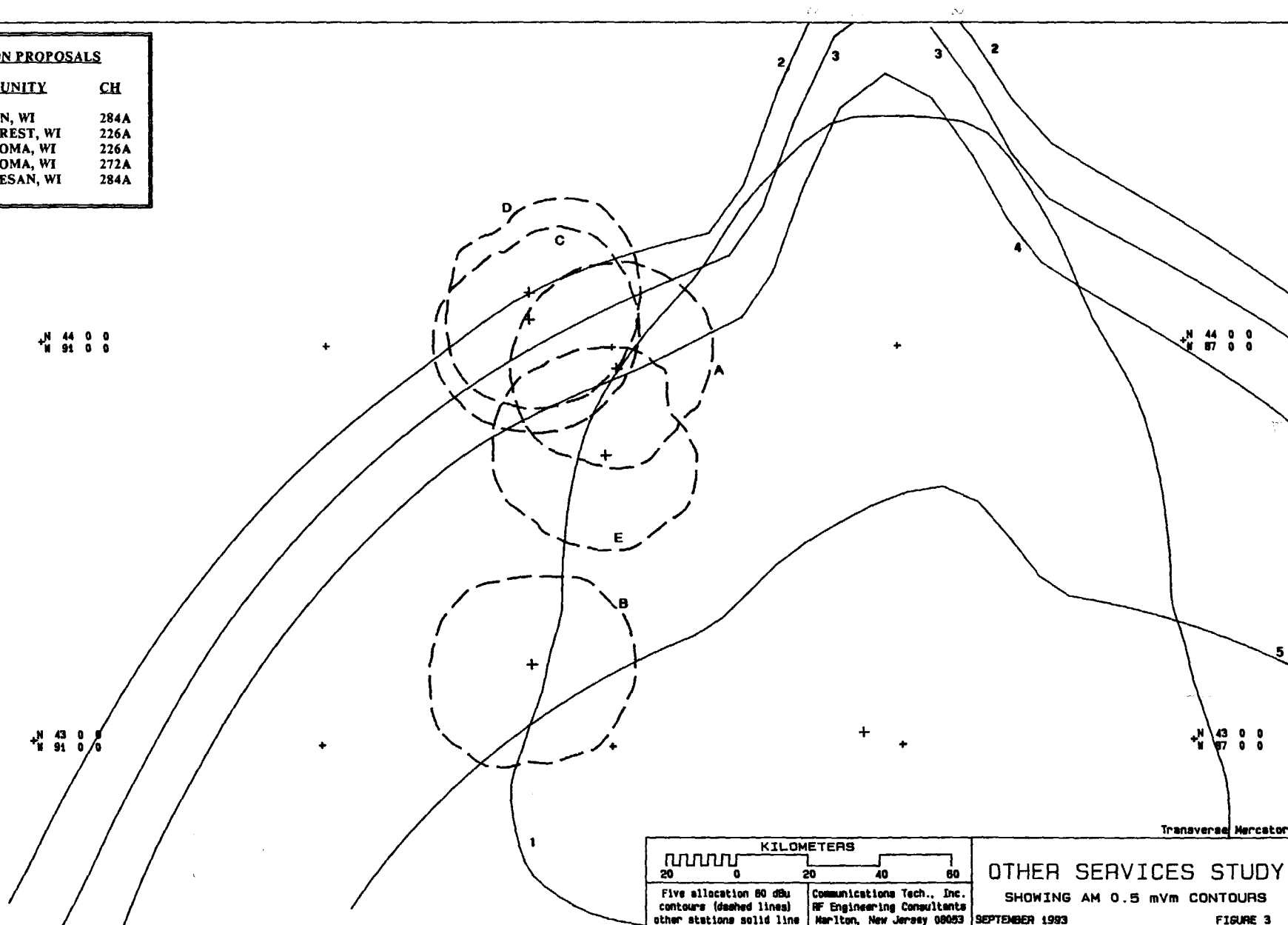
30	1330, 'US', 'WI', 'SHEBOYGAN	' , 'WHBL	' , 'B ' , 'D ' , 'U ' , 'L ' , 820329
	43, 43, 14, 87, 44, 4, 1, 113.3, 90.9		
	2, 5.000, 690.41, -1.00, 1.00, 14, 0		
	1, .650, -129.0, .0, .0, 0, 0, 138.8, .0, .0, .0, .0		
	2, .350, 129.0, 90.0, 13.0, 0, 0, 138.8, .0, .0, .0, .0		
31	1350, 'US', 'WI', 'PORTAGE	' , 'WPDR	' , 'B ' , 'D ' , 'U ' , 'L ' , 881007
	43, 31, 40, 89, 25, 52, 1, 33.3, 223.7		
	1, 1.000, 437.74, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 217.4, .0, .0, .0, .0		
32	1360, 'US', 'WI', 'GREEN BAY	' , 'WGEE	' , 'B ' , 'D ' , 'U ' , 'L ' , 810520
	44, 25, 51, 88, 4, 51, 1, 114.1, 47.7		
	1, 5.000, 690.92, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 94.5, .0, .0, .0, .0		
33	1430, 'US', 'WI', 'BEAVER DAM	' , 'WBEV	' , 'B ' , 'D ' , 'U ' , 'L ' , 900530
	43, 25, 40, 88, 54, 35, 1, 40.0, 151.7		
	1, 1.000, 313.82, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 102.0, .0, .0, .0, .0		
34	1450, 'US', 'WI', 'FOND DU LAC	' , 'KFIZ	' , 'C ' , 'U ' , 'U ' , 'L ' , 860327
	43, 47, 28, 88, 28, 16, 1, 54.3, 84.4		
	1, 1.000, 383.02, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 180.4, .0, .0, .0, .0		
35	1470, 'US', 'WI', 'WEST BEND	' , 'WBKV	' , 'B ' , 'D ' , 'U ' , 'L ' , 840713
	43, 22, 14, 88, 9, 58, 1, 89.1, 117.5		
	3, 2.500, 466.71, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, 1.837, 163.0, 90.0, 179.0, 0, 0, 90.0, .0, .0, .0, .0		
	3, 1.050, 273.0, 180.0, 179.0, 0, 0, 90.0, .0, .0, .0, .0		
36	1480, 'US', 'WI', 'MADISON	' , 'WTDY	' , 'B ' , 'D ' , 'U ' , 'L ' , 841116
	43, 1, 30, 89, 23, 48, 1, 82.5, 194.3		
	2, 5.000, 672.71, -1.00, 1.00, 13, 0		
	1, .415, .0, .0, .0, 0, 0, 108.3, .0, .0, .0, .0		
	2, .315, 120.0, 60.0, 140.0, 0, 0, 108.3, .0, .0, .0, .0		
37	1490, 'US', 'WI', 'OSHKOSH	' , 'WOSH	' , 'C ' , 'U ' , 'U ' , 'L ' , 860327
	44, 2, 46, 88, 31, 44, 1, 59.6, 55.6		
	1, 1.000, 387.85, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 185.4, .0, .0, .0, .0		

FIGURE 2  
(Page 7)

38	1510, 'US', 'WI', 'WAUKESHA	'WAUK	'B', 'D', 'D', 'L', 810625
	43, 1, 0, 88, 11, 42, 1, 111.5, 136.2		
	2, 10.000, 957.56, -1.00, 1.00, 4, 0		
	1, 1.000, .0, .0, .0, 0, 0, 83.0, .0, .0, .0, .0		
	2, 1.000, -80.0, 90.0, 3.0, 0, 0, 83.0, .0, .0, .0, .0		
39	1550, 'US', 'WI', 'MADISON	'WHIT	'B', 'D', 'D', 'L', 900416
	43, 0, 8, 89, 23, 8, 1, 84.8, 193.3		
	4, 5.000, 643.74, -1.00, 1.00, 11, 0		
	1, 1.000, .0, .0, .0, 0, 0, 90.0, .0, .0, .0, .0		
	2, 1.000, 128.0, 60.0, 175.0, 0, 0, 90.0, .0, .0, .0, .0		
	3, 1.000, 127.4, 192.0, 265.0, 1, 0, 90.0, .0, .0, .0, .0		
	4, 1.000, -.6, 192.0, 265.0, 0, 0, 90.0, .0, .0, .0, .0		
40	1570, 'US', 'WI', 'APPLETON	'WRJQ	'B', 'D', 'U', 'L', 870202
	44, 13, 4, 88, 24, 33, 1, 78.9, 48.0		
	1, 1.000, 317.04, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 106.3, .0, .0, .0, .0		
41	1580, 'US', 'WI', 'WATERTOWN	'WITN	'B', 'D', 'U', 'C', 900209
	43, 13, 18, 88, 40, 6, 1, 69.7, 146.4		
	1, 1.000, 317.04, -1.00, 1.00, 0, 0		
	1, 1.000, .0, .0, .0, 0, 0, 107.0, .0, .0, .0, .0		
42	1600, 'US', 'WI', 'RIPON	'WCWC	'B', 'D', 'U', 'L', 810608
	43, 49, 1, 88, 50, 49, 1, 25.2, 71.4		
	2, 5.000, 704.89, -1.00, 1.00, 6, 0		
	1, 1.000, .0, .0, .0, 0, 0, 87.8, .0, .0, .0, .0		
	2, .950, -136.0, 60.0, 310.0, 0, 0, 120.6, .0, .0, .0, .0		

# ALLOCATION PROPOSALS

CODE	COMMUNITY	CH
A	BERLIN, WI	284A
B	DE FOREST, WI	226A
C	WAUTOMA, WI	226A
D	WAUTOMA, WI	272A
E	MARKESAN, WI	284A





**FIGURE 3  
(PAGE 2)**

<u>CONTOUR NUMBER</u>	<u>CALL</u>	<u>FREQ kHz</u>	<u>CITY/ STATE</u>	<u>PWR kW</u>	<u>MODE</u>
1	WTMJ	620	Milwaukee WI	5	DA-N
2	WMAQ	670	Chicago IL	50	ND-N
3	WGN	720	Chicago IL	50	ND-N
4	WBBM	780	Chicago IL	50	ND-N
5	WLS	890	Chicago IL	50	ND-N